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IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JANE DOE I; *et al.*,
Plaintiffs,

vs.

LAKIREDDY BALI REDDY, *et al.*,
Defendants.

Case No. C-02-5570-WHA

**SECOND AMENDED RESPONSES TO
PLAINTIFF JANE DOE I'S FIRST SET OF
INTERROGATORIES TO DEFENDANT
LAKIREDDY BALI REDDY**

AMENDED

PROPOUNDING PARTY: PLAINTIFF JANE DOE I

RESPONDING PARTY: LAKIREDDY BALI REDDY

SET NUMBER: ONE (AMENDED)

14. Did YOU ever have SEXUAL RELATIONS with any of the PLAINTIFFS?

RESPONSE: Upon advice of counsel responding Party asserts his Fifth Amendment right against self-incrimination. Without waiving the above objection responding party answers, yes.

15. If YOUR answer to Interrogatory No. 14 is yes, list the PLAINTIFFS with whom you had SEXUAL RELATIONS.

RESPONSE: Upon advice of counsel responding Party asserts his Fifth Amendment right against self-incrimination. Without waiving the above objection responding party had sexual relations with Doe I, Doe II, Doe III and Chanti Jyosthna Devi Prattipati.

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16. For each PLAINTIFF listed in response to Interrogatory No. 15, state the number of times you had SEXUAL RELATIONS with the PLAINTIFF. (If YOU cannot provide the exact number, provide your best approximation.)

RESPONSE: Upon advice of counsel responding Party asserts his Fifth Amendment right against self-incrimination. Without waiving the above objections responding party provides the following explanation:

1. Doe I-Responding party does not remember the exact number of times he had sexual relations with Doe I. Responding party believes it to be less then ten.
2. Doe II- Responding party does not remember the exact number of times he had sexual relations with Doe II. Responding party believes it to be less then ten.
3. Doe III- Responding party does not remember the exact number of times he had sexual relations with Doe III. Responding party believes it to be between ten and thirty times.
4. Chanti Jyosthna Devi Prattipati- Responding party does not remember the exact number of times he had sexual relations with Chanti Jyosthna Devi Prattipati. Responding party believes it to be less then ten.

17. For each PLAINTIFF listed in response to Interrogatory No. 15, state the earliest date and the most recent date on which you had SEXUAL RELATIONS with the PLAINTIFF. (If YOU cannot provide the exact date, provide your best approximation.)

RESPONSE: Upon advice of counsel responding Party asserts his Fifth Amendment right against self-incrimination. Without waiving the above objections responding party provides the following explanation:

1. Doe I-Responding party does not remember the first time he had sexual relations with Doe I. Responding party believes the last time he had sex with Doe I was in January of 2000.
2. Doe II- Responding party does not remember the exact date he had sexual relations with Doe II. Responding party believes the first and last time he had sex with Doe II was 1999. Responding party cannot be more specific.

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1 3. Doe III- Responding party does not remember the first time he had sexual relations with
 2 Doe III. Responding party believes the last time he had sex with Doe III was either in
 3 1995 or 1996.

4 4. Chanti Jyosthna Devi Prattipati- Responding party does not remember the exact date he
 5 had sexual relations with Chanti Jyosthna Devi Prattipati. Responding party believes the
 6 first and last time he had sex with Chanti Jyosthna Devi Prattipati was 1999. Responding
 7 party cannot be more specific.
 8

9 18. For each PLAINTIFF listed in response to Interrogatory No. 15, state the physical
 10 location(s) where you had SEXUAL RELATIONS with the PLAINTIFF. (If YOU cannot provide
 11 the exact location(s), provide your best approximation.)

12 **RESPONSE:** Upon advice of counsel responding Party asserts his Fifth Amendment right against
 13 self-incrimination. Without waiving the above objections responding party provides the following
 14 explanation:

- 15 1. Doe I-Responding party had sex with Doe I in her apartment in Berkeley, defendant Vijay
 16 Lakireddy's home, and his home in India.
- 17 2. Doe II- Responding party had sex with Doe II in her apartment in Berkeley.
- 18 3. Doe III- Responding party had sex with Doe III his home in Velvadam and Doe III's
 19 apartment in Berkeley.
- 20 4. Chanti Jyosthna Devi Prattipati- Responding party had sex with Chanti Jyosthna Devi
 21 Prattipati in her apartment in Berkeley.
 22

23 19. In YOUR PLEA AGREEMENT, YOU admit that "[b]etween 1986 and January 2000,
 24 [YOU] agreed with [YOUR] codefendants and others to bring Indian nationals into the United
 25 States on the basis of fraudulent visas." IDENTIFY all the "Indian Nationals" whom you "agreed
 26 with [YOUR] codefendants and others to bring. . . into the United States on the basis of
 27 fraudulent visas."

28 **RESPONSE:** I have responded to discovery based on the advice of my criminal counsel to assert

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1 my Fifth Amendment privilege against self-incrimination where necessary. I have been informed
 2 that this court has ruled that I am not entitled to assert my Fifth Amendment rights against self-
 3 incrimination and that I must respond to discovery. I also understand that under Federal Rule of
 4 Civil Procedure 37, this Court has the power to enter monetary sanctions and other sanctions that
 5 could cause me and my family great economic harm. Although I respectfully disagree with the
 6 Court's Order I am providing the following answer because I fear this Court's sanctions. I am
 7 making no voluntary waiver of my Fifth Amendment rights against self-incrimination and I do
 8 not waive my rights to judicially challenge this Court's Order.

9 I assisted the following individuals; Doe I, Doe II, Doe III, Doe IV, Doe V, Doe VI, Doe VIII,
 10 Jhansi Vemireddy, Ambika Velvadapu, Koteswara Gurralla, Koteswari Patakottu, Sriram Reddy
 11 Kudumula, Kota Reddy Kudumula, Somulu Garlapati, Ramulamma Chattu, Gopal Yerragunta,
 12 Kitemma Yerragunta, Sudha Mallu, Krishna Reddy Mallu, Shaik Ali Khan, Shaik Kudan Saheb,
 13 Shaik Meera Vali and Shaik Subhani.

14 I have reviewed my plea agreement in its entirety and am unable to more specifically
 15 identify any other person referenced in my plea agreement.
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20. In YOUR PLEA AGREEMENT, YOU admit that "[b]etween 1986 and January 2000, [YOU] agreed with [YOUR] codefendants and others to bring Indian nationals into the United States on the basis of fraudulent visas." IDENTIFY all the "codefendants and others" with whom you "agreed. . . to bring Indian Nationals into the United States on the basis of fraudulent visas."

RESPONSE: I have responded to discovery based on the advice of my criminal counsel to assert my Fifth Amendment privilege against self-incrimination where necessary. I have been informed that this court has ruled that I am not entitled to assert my Fifth Amendment rights against self-incrimination and that I must respond to discovery. I also understand that under Federal Rule of Civil Procedure 37, this Court has the power to enter monetary sanctions and other sanctions that could cause me and my family great economic harm. Although I respectfully disagree with the Court's Order I am providing the following answer because I fear this Court's sanctions. I am making no voluntary waiver of my Fifth Amendment rights against self-incrimination and I do not waive my rights to judicially challenge this Court's Order.

See response to interrogatory 19.

Dated: 9-23-03

BISHOP, BARRY, HOWE, HANEY & RYDER

By: 

MICHAEL W BOLECHOWSKI
 MARK C. RASKOFF
 DAVID L. HART